1   Q.   And your box just displays, I don't

2 know, maybe 10 or something like that.

3   A.   Actually, there are feature groups, the

4 first of which is custom calling.

5   Q.   Okay.

6   A.   Within LENS, there is one -- you can

7 select from a really long list of features.

8   Q.   Right.

9   A.   Then there's also one really long

10 button for like the five most common featured

11 groups, like Touch Star -- I'm not sure of all the

12 different groupings, custom calling. And

13 essentially this is broken down in kind of like a

14 tree format, in a hierarchy format.

15   If the customer calling feature group

16 were closed down, you would see the other feature

17 groups within there. And you could open up one of

18 those. And you would see the associated features,

19 as you see here. If you were to open up the

20 three-way calling node, as is indicated that you

21 can do so by the fact that it has that little

22 sideways triangle there -- there are actually

23 multiple levels of information that are available

24 on the screen.

25   Q.   Okay. When you get your -- make this

1   feature query through the OP, do you receive back

2   the whole universe in one call? Do you receive

3   back all the data, or do you have to make multiple

4   calls whenever you want to look for different

5   information regarding a particular feature

6   service?

7   A.   No. All the information for those five

8   most common feature groups comes back in one, the

9   same as it does in LENS. It's all on essentially

10   one web page.

11   Q.   One call?

12   A.   Right. And we package that up to be

13   displayed in this hierarchy format. You either

14   open up a certain feature group to display more

15   information within that -- if you want it to

16   display more information, you would open up that

17   node. You take it to whatever level you want the

18   information.

19   Q.   But beyond those five, does that

20   require additional calls to the --

21   A.   This application was not designed to

22   handle other than those five.

23   Q.   Okay.

24   A.   We made a decision that most of -- the

25   reason all those five are on one button is because

1   in a large percentage of the time, those are the

2   ones that are going to be used and none else,

3   especially for new service residential, which is

4   what we were contracted to do.

5   So in mimicking a CLEC, we decided that

6   our CLEC would only ever use those features and

7   services.

8   Q.   Let me pose a question to you.   If

9   another CLEC decided that he wanted all the

10   features and functions available, would that

11   require multiple calls to BellSouth data base?

12   A.   I don't know -- I know that you can get

13   information on multiple feature groups by clicking

14   each line in a drop-down list, control, while

15   holding down the control key which is a standard

16   way of multiple selection in a drop-down list.

17   I don't know if there's a limit on the

18   number that can be returned.   I don't know if you

19   could control click every single one in the list.

20   But provided that you could do that, you could

21   construct, in my opinion, a call to the CGI server

22   to retrieve all --

23   Q.   All the products and services?

24   A.   Right.   I don't know -- from a

25   performance standpoint, I don't know that it would

1   be desirable to do that.   If you're only

2   interested in a few, you probably wouldn't want

3   all of them to come back.   But again --

4   Q.   If you wanted to --

5   MR. ALEXANDER: Can he finish his

6   answer before you ask the next question?

7   MR. RUNNELS: Well, basically all I was

8   going to say is that there is multiple ways to do

9   it; right?   If you know you're only going to use a

10 certain set of features and services, we could

11 have saved that in the database.   Personally, if I

12 were doing that -- we didn't do that because there

13 are two points to this prototype, if you want to

14 call it that.

15   One is to show what a CLEC might want

16 to do.   The other is to show what functionality

17 can provided.   We might want to pull a lot of

18 stuff from a database.   But that doesn't do a

19 whole lot of good for BellSouth to show that we

20 can pull these things from the CGI.

21   So even though, in my opinion, you

22 might want to pull this from your own internal

23 database, we left this in as a CGI call to show

24 that it can be done.

25   Q.   And if a CLEC want to have a list of

1   the BellSouth services and wanted to be able to do

2   a search capability within those, you know, full

3   range of services, you are not sure whether that

4   would require multiple calls?

5   A.   I'm not sure, but I don't think it

6   would. It depends on the limitation of the --

7   Q.   Control click?

8   A.   -- control click, the multiselection of

9   items within a drop-down list.

10   Q.   You've said that to get the available

11   carriers, I think what you mean by that is the

12   long distance carriers?

13   A.   Yes, yes.

14   Q.   And you said that you thought that a

15   CLEC would want to have his own database to do

16   that?

17   A.   Correct.

18   Q.   What led you to that conclusion?

19   A.   Apparently one of the complaints that

20   CLECs had, according to Alex Dizon, is that in

21   BellSouth's version of the pre-order firm order

22   stuff -- which I haven't seen, so I really don't

23   know -- there are certain ones that they choose

24   from all the time.

25   They get a certain list. They always

1   get that list. Whereas the CLECs get this

2   randomly generated list that they have to click

3   through multiple times. So it was decided that a

4   CLEC would probably more likely want to have a

5   single list that they chose from, rather than have

6   to rely on getting -- I guess BellSouth's, I don't

7   know, legally obligated to provide in a random

8   order a listing of every possible long distance

9   carrier.

10   I don't know. And a CLEC probably

11   wouldn't want to have to wade through that. So we

12   just stored that in the CLEC's database.

13   Q.   What if a CLEC had the same legal

14   obligation?

15   A.   I suppose they would get -- I suppose

16   they would get the list. Well, I don't know. I

17   mean, from a personal standpoint, if I were a CLEC

18   and I had to provide the same possibilities for

19   the customer, I would probably use the same list

20   that BellSouth uses. I don't know where you can

21   obtain that, but that's what I would obtain. I

22   still probably would not go through BellSouth to

23   do that.

24   Q.   And why wouldn't you go through

25   BellSouth?

1   A.   Well, if there's a list, why not store

2   it yourself instead of retrieve it from somebody

3   else each time you needed to use it?

4   Q.   What if the list changes?

5   A.   Well, again, it depends on who you're

6   saying is responsible for providing the

7   availability.

8   Q.   Okay.

9   A.   If you're saying BellSouth is legally

10 obligated and you as a CLEC want to mimic that,

11 then maybe you should hit BellSouth every time.

12 If you're saying the liability falls more on the

13 CLEC, then maybe the CLEC should get the list

14 directly rather than relying on BellSouth to

15 maintain.

16   Q.   Okay. On the firm order phase, someone

17 said that you don't need a CSR for a new

18 residential order. I can't remember which one.

19 Do you recall?

20 BY MR. BERMAN:

21   A.   I said I don't believe that -- I was

22 the one that said that you didn't have to have a

23 CSR for a new residential order.

24   Q.   If a customer was adding a new line to

25 his house, did you think about that situation on

1   whether a CSR would come in handy?

2   A.   No.

3   Q.   So you just assumed that it was a new

4   customer, you wouldn't have a customer service

5   record for him?

6   A.   That's correct.

7   Q.   On the due date calculation, there

8   was -- Jack, I think you said that it was -- you

9   validated the date in the firm order or in the

10   ordering mode.

11   BY MR. RUNNELS:

12   A.   Yes.

13   Q.   I'm trying to think what page.

14   MR. ALEXANDER: I think it's on 16.

15   BY MR. HOPKINS:

16   Q.   16, thank you.   Is that validation

17   process just making sure that your desired due

18   date isn't one of the close dates?

19   A.   Correct.

20   Q.   So if the first date available was --

21   let's look at this example -- was April 12th,

22   that's the first date available, and you place the

23   order on April 11th, and populates it with the

24   April 12th, that would assume that's a valid date;

25   is that correct?

1   A.   The page that I'm looking at shows

2   April 12th as a close date.

3   Q.   Further down. It's not in order, I

4   see. Let's do it a step back then. Let's say the

5   first date available is April 11th, and you make

6   the order on April 10. Would that say that's a

7   valid due date?

8   A.   Yes.

9   Q.   And so that doesn't take into account

10   the intervals provided below in that it takes

11   several days to provide a particular service or

12   feature?

13   A.   Not in our application.

14   Q.   So that your system, as it stands, may

15   validate a date that would be rejected by the

16   system?

17   A.   Yes.

18   Q.   On the CSR, page 25, the top box --

19   well, on the left, which is it has Dizon and

20   Alex -- Dizon, Alex and Callie, you have two

21   different addresses there. Do you remember

22   whether one address represents the location, and

23   the other address represents the directory

24   listing?

25   A.   That is correct. One is the service

1   address. Looking at this right now, I can't read

2   the field labels. I'm not sure exactly which one

3   is which.

4   Q.   Neither can I.

5   A.   One is a service address, one is the

6   directory listing address.

7   MR. ALEXANDER: Just for the record,

8   it's because of the copy quality on the paper.

9   MR. HOPKINS: It wasn't intentional,

10   I'm sure.

11   MR. ALEXANDER: I'm sure. Mike, can I

12   just ask a question. You've spent a lot of time

13   on this. Are you --

14   MR. HOPKINS: I'm going to move through

15   it quickly.

16   MR. ALEXANDER: Okay. That's fine.

17   MR. MERSHON: I think this has been

18   asked and answered.

19   MR. HOPKINS: This question hasn't been

20   asked and answered.

21   MR. RUNNELS: Yes, it has.

22   MR. HOPKINS: He didn't know what the

23   two represented. One said that one was the

24   location and one was a directory listing.

25   MR. RUNNELS: I thought I had.

1   MR. HOPKINS: If you did, I missed it,

2   and I apologize.

3   MR. ALEXANDER: That's fine. That's

4   the only reason I asked. I think a lot of detail

5   was done on this particular page.

6   BY MR. HOPKINS:

7   Q.   And you said you didn't know what would

8   have to be parsed to go into an EDI order for,

9   let's say, the address; is that correct?

10   A.   I'm not familiar with it at that level

11   of detail.

12   Q.   Now, if you look at page 17, which is

13   your firm order -- I think this is your firm order

14   sheet.

15   A.   Is that the --

16   Q.   Well, your firm order window? Or is

17   there a different firm order? Well, let me just

18   refer you to page 15. And I think that's the firm

19   order window; is that correct?

20   A.   15?

21   Q.   Yes.

22   BY MR. BERMAN:

23   A.   That's the start of it.

24   BY MR. RUNNELS:

25   A.   That's the first tab within the firm

1   order.

2   Q.   So assuming that this window parses it

3   in what's required to go into an EDI, do you think

4   it would be reasonable to assume that this form

5   parses it in enough detail to create a valid EDI

6   order?

7   A.   Yes.

8   Q.   And so you'd have to at least separate

9   out the city and state and zip code from the

10 street address?

11   A.   I don't know. Those may have been

12 concatenated back together,

13 c-o-n-c-a-t-e-n-a-t-e-d.

14   Q.   What does that mean?

15   MR. ALEXANDER: Mike, I thought you

16 knew that.

17   MR. RUNNELS: Those may have been

18 combined into one string for purposes of entering

19 it into a field on the EDI order. I don't know.

20 BY MR. HOPKINS:

21   Q.   You don't know. So this isn't a way to

22 figure out how it's necessary to parse an address

23 for EDI order?

24   A.   No.

25 BY MR. BERMAN:

1   A.   There's no guarantee.

2 BY MR. RUNNELS:

3   A.   I don't know that.

4   Q.   You don't know. Okay. That's fair.

5 That's fair.

6   A.   In fact, most of the things in the

7 windows are more from a presentation standpoint.

8 I mean, for purposes of presenting, you know, it

9 makes sense to have the city and the state and the

10 zip separated, if you can do that.

11   Q.   You were asked whether a data

12 dictionary is the same as a CSR layout. And you

13 said, I think, you don't know; is that correct?

14 BY MR. BERMAN:

15   A.   I don't know.

16   Q.   You don't know if that's what you said,

17 or you don't know that.

18   A.   I don't know that they're the same

19 thing.

20   Q.   Thank you. Do you understand what --

21 what's your understanding of what a data

22 dictionary is?

23   A.   I actually haven't heard that term

24 until this in quite a while. I don't know.

25   Q.   Okay. Fair enough. I think I'm near

1   complete. Let me just check my notes here.

2   Clarification of an earlier question.

3   Does the OP replace the web browser?

4   Is that one of its functions?

5   A.   OP is just another entry vehicle into

6   the CGI server.

7   Q.   Okay. You stated before you didn't

8   send an actual order through into BellSouth's

9   systems; is that correct? Through the EDI?

10   A.   We would hand the files off to Alex

11   Dizon.

12   Q.   So --

13   A.   At that point, I don't know --

14   Q.   What happened?

15   A.   -- what was run with the files.

16   Q.   Was there any consideration on the

17   provisioning aspects of receiving provisioning

18   notices? Did you --

19   A.   No.

20   Q.   You didn't deal with that at all?

21   A.   (Witness shook head negatively.)

22   Q.   When you were constructing your OP

23   interface with respect to features and services,

24   did you consider whether the services and features

25   offered might vary from BellSouth central office

1   to BellSouth central office?

2   BY MR. RUNNELS:

3   A.   That's based on the address

4   validation.

5   Q.   Well, my question is, did you consider

6   whether the features and services may vary from

7   central office to central office?

8   A.   The features and services that are

9   pulled back --

10   Q.   Right.

11   A.   -- within our application are based on

12   the address that was validated --

13   Q.   Right.

14   A.   -- which is used to determine the

15   central office.

16   Q.   Right. But if someone was to keep its

17   own database for features and service, you'd have

18   to know how they vary from central office to

19   central office?

20   A.   Correct.

21   Q.   And do you know whether the available

22   interexchange carriers vary from central office to

23   central office?

24   A.   I don't know. I do --

25   Q.   Go ahead.

1   A.   I do know that, again, for you to pull

2   that back from the CGI, you would have to enter a

3   valid address.

4   Q.   All right.

5   A.   So if it did and you did choose to use

6   that as a population method as opposed to a

7   database, you would most likely be getting the

8   carriers that were available for that central'

9   office.

10   Q.   You had mentioned some testing. Could

11   you please tell me what types of tests you ran?

12   A.   Basically everything starts with the

13   address validation. I tried addresses for people

14   that I had permission to do so, telephone numbers

15   for people that I had permission to do so, tried

16   parts of addresses to see what would happen if I

17   didn't put in a valid address to handle either

18   nothing coming back or multiple potential

19   addresses coming back.

20   Everything else kind of drives from

21   there. You have the valid address. When you go

22   to reserve telephone numbers, I'm not sure that

23   anything is really required on that screen. We

24   defaulted to random numbers as a selection.

25   I think you can fill in or not fill in

1   the other fields if you want to, even within

2   LENS. You get those back.

3   Q.   But let me try to cut this a little

4   shorter. Was there any systematic testing, or was

5   it just kind of ad hoc, for lack of a better

6   word?

7   A.   There wasn't a --

8   Q.   You can characterize --

9   A.   -- testing tool if that's what you're

10 asking.

11   Q.   -- it how you want to. Okay.

12   A.   There was no testing tool.

13   Q.   That's I think what I was after. The

14 last question I have is, on the CSR, when you view

15 the CSR, is the only way to do that through a

16 telephone number? You can't do it through an

17 customer's name or --

18   A.   I don't know if there's any other way

19 to do it. The CGI specs refer to doing it in a

20 similar way that it's done in LENS.

21   MR. HOPKINS: Okay. That's fair.

22 That's all I have. Thank you very much.

23   MR. ALEXANDER: Well, you did mean that

24 was your last question. Thank you.

25   (A discussion was had off the record.)

1   MR. ATKINSON: Good afternoon,

2   gentlemen. I'm Bill Atkinson on behalf of Sprint

3   Communications Company, LP. I have just a few

4   questions for you this afternoon. And I usually

5   say that as well.

6   MR. ALEXANDER: I know.

7   (A discussion was had off the record.)

8   EXAMINATION

9   BY MR. ATKINSON:

10   Q.   You've discussed on page 1 the entry

11   under project architect in prior testimony today.

12   I'd like to clear up something, at least in my

13   mind. There's been some discussion of the

14   performance requirements.

15   I'd like to address your attention to

16   the phrase set forth by BellSouth

17   Telecommunications in that entry. And I'll just

18   ask you, because it's still unclear to me, how did

19   BellSouth set forth to Albion the performance

20   requirements?

21   BY MR. BERMAN:

22   A.   Again, there's no set throughput. So

23   thus, because the application works that's the

24   performance requirements at this point.

25   Q.   There was no written set of performance

1   requirements handed to Albion?

2   A.   That's correct.

3   Q.   So any performance requirements that

4   would have been passed from BellSouth to Albion

5   would have been orally?

6   BY MR. RUNNELS:

7   A.   There were none.

8   Q.   There were none.

9   A.   There were none, other than that it

10   work.

11   Q.   Okay. I direct your attention to

12   page 2 of the report under requirements. There it

13   reads under that heading, from a business

14   requirements' perspective, BellSouth's LENS web

15   application was used as a model for the business

16   requirements used in OP. Is that a correct

17   reading?

18   BY MR. BERMAN:

19   A.   That's correct. We were not -- this is

20   not our -- we had for previous experience in this

21   problem domain. And the use of LENS was a way to

22   familiarize ourself.

23   BY MR. RUNNELS:

24   A.   To further clarify that, if we as

25   Albion were developing an application like this

1   for a CLEC, we would ask the CLEC how would you

2   like this to look, what would you like it to do?

3   And not being able to do that, since we were

4   mimicking a CLEC ourselves, we made it look

5   similar in some respects to LENS where we thought

6   it made sense to do so and change the look where

7   we thought it made sense to do so.

8   Q.   Gentlemen, I want you to feel free to

9   explain your responses, but the question I was

10   asking you, did I read that portion of the report

11   correctly? That's what I was looking for. But if

12   you have comments in the future on that, then

13   they're welcome.

14   The excerpt I read you -- I guess I'll

15   direct this question to Mr. Berman -- does this

16   excerpt that I read to you mean that BellSouth

17   provided initial business requirements for the

18   software, or were the initial business

19   requirements developed by Albion?

20   BY MR. BERMAN:

21   A.   BellSouth.

22   Q.   BellSouth provided the initial business

23   requirements for the software?

24   A.   Through basically -- you know, this is

25   the LENS application, okay. And this is

1 effectively we want to have you guys integrate to

2 the back-end services behind this application for

3 the pre-order component.

4 BY MR. RUNNELS:

5   A.   If I may add to that, the first day --

6 either the first day or the second day that I was

7 on the project, Rob and I met with Alex. Alex

8 walked us through the steps of the pre-order and

9 the firm order in LENS and said, "Your application

10 needs to be able to do this."

11   Q.   And for clarity of the record, we're

12 speaking of Alex Dizon?

13   A.   Alex Dizon.

14   Q.   Dizon?

15   A.   Yes.

16   Q.   Thank you.

17   A.   And as far as presentation of that or

18 what we decided to add to make it, I guess, more

19 customizable for a CLEC or whatever, that was more

20 up to us. The bottom line was that it had to

21 do -- it had to be able to create an order.

22   Q.   So what I hear you saying is that

23 initial expectations of business requirements were

24 given by Alex Dizon and BellSouth, but as far as

25 customizing those requirements into workable

1   software application, that was up to Albion?   Is

2   that correct?

3   BY MR. BERMAN:

4   A.   That's correct.

5   Q.   Just for your reference on page 4 of

6   the report under the new service residential

7   heading, it states there that the OP application

8   converts the completed order to an EDI document

9   that an interface -- that can interface with the

10 Harbinger EDI-PC software application.

11   And my question to you is, to your

12 knowledge, is the Harbinger application also a

13 proprietary interface?

14 BY MR. BERMAN:

15   A.   I don't know the answer to that

16 question.

17   Q.   You don't know.   To your knowledge, are

18 Albion and Harbinger affiliated entities, to your

19 knowledge?

20   A.   No.

21 BY MR. RUNNELS:

22   A.   No.

23   Q.   I'd like to discuss briefly the

24 information that was given to Albion by

25 BellSouth.   In preparation and in your fruition of

1   this project, when were you first told -- or were

2   you first told by BellSouth personnel that Albion

3   was being furnished the same information that had

4   been furnished to CLECs in their development of an

5   integrated pre-ordering ordering interface

6   application?

7   BY MR. BERMAN:

8   A.   I didn't have that conversation.

9   MR. ALEXANDER: I'm looking at the page

10   where that information is listed. And

11   unfortunately -- I think it's page 2 -- I don't

12   see the language you just added in your question.

13   If it's there, please direct -- I think it's

14   page 3 where that information is listed.

15   BY MR. ATKINSON:

16   Q.   Are you familiar with Mr. Stacy's

17   affidavit that was submitted in connection with

18   these proceedings?

19   A.   Yes, I've read it.

20   Q.   You have read it?

21   BY MR. RUNNELS:

22   A.   I can make this quick. I was told from

23   Day One we weren't going to get anything more than

24   a CLEC would get.

25   Q.   And who told you that, Mr. Runnels?

1   A.   Alex Dizon.

2   Q.   Alex Dizon.

3   A.   Now, I don't know. I mean, since I

4 don't know what a CLEC normally gets, I can't say

5 that we got what a CLEC normally gets. I was told

6 that we weren't going to.

7   Q.   You never consulted with CLECs during

8 the course of your project as to the information

9 currently available to them for if they were to

10 attempt this type of development?

11 BY MR. BERMAN:

12   A.   No.

13   Q.   And that's to either of you, if you

14 will go just one at a time, please.

15 BY MR. RUNNELS:

16   A.   Well, I looked on the Internet at the

17 information that was available to CLECs. And I

18 can say that what is said that we used here is

19 what we used here. There's actually a lot more

20 information available than what we used.

21 BY MR. BERMAN:

22   A.   Copious amounts.

23   Q.   Mr. Berman, you read Mr. Stacy's

24 affidavit in this proceedings?

25   A.   Yes.

1   Q.   I'm going to read a portion from

2   paragraph 16 in the affidavit and get you to

3   accept that subject to check.

4   MR. ALEXANDER: Can I just clarify

5   which proceedings? Because, as you know, there

6   have been FCC documents. Are you talking strictly

7   the Kentucky 96-608, Bill?

8   MR. ATKINSON: Right. I can hand this

9   to the witness if I can --

10   MR. ALEXANDER: The reason I ask is

11 that I don't know that he's seen every affidavit

12 in every proceeding. So if you don't mind, show

13 it to him.

14 BY MR. ATKINSON:

15   Q.   If I could step behind you, Mr. Berman,

16 I promise not to stay long. For the record, this

17 is the affidavit that Mr. Berman and I were

18 discussing just a moment ago. It's the affidavit

19 of William N. Stacy on Operational Support

20 Systems. It was filed June 19th, 1998, in Case

21 Number 96-608, the case we're here today to

22 further.

23   And I'd like to direct your attention

24 to a portion of paragraph 16 where Mr. Stacy

25 states in his affidavit -- I'll wait for counsel.